

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

VISIBLE SYSTEMS CORPORATION,

Plaintiff

v.

UNISYS CORPORATION,

Defendant

Civil Action No. 04-CV-11610-RGS

**MOTION OF PLAINTIFF TO FILE
SUMMARY JUDGMENT PAPERS UNDER SEAL**

Plaintiff Visible Systems Corporation (“Visible”) hereby moves pursuant to LR 7.2 of this Court” for an Order permitting Plaintiff to file all of its papers submitted in conjunction with its Opposition to Defendant’s Motion for Summary Judgment (“Opposition”), under seal. As grounds for this motion, Visible states that many of the exhibits and deposition transcripts attached to the Opposition materials contain information designated by Unisys as “Confidential” under the parties’ Confidentiality Agreement. Visible’s Opposition papers make references to, and quote directly from, these “Confidential” materials. Many of these documents are governed by a Protective Order entered by this Court on November 10, 2005.

Pursuant to Local Rule 7.2(a), Visible suggests that it file its Opposition papers with this Court in a clearly marked envelope or other packaging, to which the Clerk should attach a copy of this Court’s order; and that upon further order of this Court dissolving any such order, the documents should be returned to Visible’s counsel.

WHEREFORE, Visible respectfully requests that this Court issue an order permitting Visible to file all papers in conjunction with its Opposition to Motion for Summary Judgment under seal.

Plaintiff,

VISIBLE SYSTEMS CORPORATION

By its attorneys:

/s/ Stephen H. Galebach

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Dated: December 22, 2006

LOCAL RULE 7.1(A)(2) CERTIFICATE

Pursuant to Local Rule 7.1(A)(2), I, Stephen H. Galebach, hereby certify that prior to filing the foregoing Motion of Plaintiff to File Summary Judgment Papers Under Seal, I conferred with Defendant's counsel by e-mailing a copy of this motion to him two days in advance, in a good faith attempt to resolve or narrow the issues raised thereby; and Defendant's counsel has made no objection.

/s/ Stephen H. Galebach

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Stephen H. Galebach